

I manage an Internet Service Provider, providing service in Rural Alabama. We offer wireless broadband as well as conventional dial-up service. The are we provide service in has no other access to broadband internet. I would like to address some of the issues we face, as well as solutions to these issues. My comments will be directed to Rural and Semi-Rural areas.

My background covers 27 years of communications experience, including, Military microwave and satellite communications, Commercial Digital Satellite (SBS) communications, long distance carrier, central office switching systems. two-way radio communications(including VHF, UHF and Satellite), frame-relay, and internet digital communication. I also held a First Class Radiotelephone Operator License. I do not consider my self an amateur in the field of communications.

We are upon a crossroads in the process of closing the "Digital Divide" in the rural areas. Across this great land there are hundreds of small locally owned Wireless Broadband providers. These providers are not funded by venture capitalists with deep pockets, they are mostly owned by individuals or a small group of individuals. These providers have succeeded where large nationwide corporations have failed. These large corporations with access to huge customer bases in the large metropolitan areas have not been able to sustain a profitable position in the market place. The small locally owned operations on the other hand have and are flourishing. We provide this service to people whom often times are our friends and neighbors. This give us an insight that others cannot obtain. We have done a wonderful job so far, but there are issues that are preventing us from growing and moving into even more areas. These issues are 1) Access to additional spectrum, 2) Technology and Spectrum to provide service where no Line of Sight exist. 3) Additional power when warranted, to reach underserved areas.

My recommendations are as follows.

1,2). The existing spectrum was set aside many years ago and the Commission, nor anyone else could have conceived that it would be used as it is today. The most popular spectrum, 2.4GHz, is used by Microwave ovens, cordless phones, Blue Tooth, and others. The second most popular and growing is the 5.2/5.8GHz bands. This band is not as populated as the 2.4GHz band but does not lend its self to Non Line of Sight deployment. The other band, 900MHz is also less populated and lends its self more so to Non Line of Sight, but is also shared by other devices. This industry is in need of spectrum designated for the deployment of Broadband services, and broad band services only. I this spectrum would need 2, 3 or 4 segments each one capable of providing the service needed. Access to these segments would be on a first come first serve basis. Moving into additional segments by a provider would only be allowed when justified. I would advise not to auction these segments off to the highest bidder. This process has not shown to be in the best interest of the consumer. It is clear that the organizations that are surviving are the small ones. These small ones cannot afford to participate in these bidding wars.

3). The use of additional power, where warranted to penetrate into areas that would not be accessible otherwise. The use of this power would be restricted to given geographic areas and could be contained by directional antennas.

4). The use of a designated System Engineer for each organization using these bands. This position would not require a Professional Engineer but rather a person with the knowledge of RF systems, and propagation. This position would allow for proper system design, preventing interference and the use of unnecessary power.

Please consider

Dave Robertson, Manager  
ITC Inc.  
[dave@bamacomm.com](mailto:dave@bamacomm.com)  
205-695-9487